

ORIGINAL



Wiley Rein & Fielding LLP

1776 K STREET NW
WASHINGTON, DC 20006
PHONE 202.719.7000
FAX 202.719.7049

7925 JONES BRANCH DRIVE
SUITE 6200
McLEAN, VA 22102
PHONE 703.905.2800
FAX 703.905.2820

www.wrf.com

April 11, 2003

Michael J. McCarthy
202.719.7134
mmccarth@wrf.com

RECEIVED

APR 11 2003

BY HAND

Marlene Dortch, Secretary
Federal Communications Commission
The Portals
445 Twelfth Street, SW
Washington, DC 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: Notice of Ex Parte Presentation
MB Docket No. 02-277, MM Docket Nos. 01-235, 01-317, 00-244

Dear Ms. Dortch:

On behalf of Belo Corp., Dallas, Texas ("Belo"), and pursuant to Section 1.1206(b)(2) of the Commission's rules, this notice is hereby submitted regarding a permitted oral ex parte presentation concerning the above-referenced rulemaking proceedings.

On April 9 and 10, 2003, executives from Belo met with the following Federal Communication Commissioner and staff: Chairman Michael Powell, Marsha J. McBride, Chief of Staff, Susan M. Eid, Legal Advisor (April 9); and W. Kenneth, Ferree, Chief of the Media Bureau (April 10). At the meetings, representing Belo were Robert W. Decherd, Chairman of the Board, President and Chief Executive Officer; Guy Kerr, Senior Vice President/General Counsel and Secretary; Regina A. Sullivan, Vice President/Government and Public Affairs; and the undersigned.

During the meetings, Belo's principals discussed the above-referenced Broadcast Ownership rule makings focusing on points contained in Belo's Comments and Reply Comments filed in the proceedings. Belo stressed with Chairman Powell and Mr. Ferree the importance of maintaining absolute consistency with respect to the Commission's ownership rules, taking all relevant media voices into account and weighing such voices in accordance with the functions they perform in the competitive news and information marketplace. Thus, if there is to

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be any kind of quantitative index as **part** of the ownership rules finally adopted, in Belo's view such an index must realistically reflect the role played by each media voice in the market.

Very truly yours,


Michael J. McCarthy
Counsel to Belo Corp.

cc (via email): Chairman Michael Powell

Ms. Marsha J. McBride

Ms. **Susan** M. Eid

Mr. W. Kenneth Ferree

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